

**AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT**

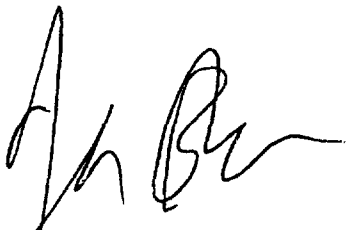
State of Georgia )  
St. Simons Island ) ss:  
County of Glynn )

**JEFFERSON G. BROCK**, being duly sworn, deposes and says that he is an officer of Graham Brock, Inc. Graham Brock has been engaged by Pueblo Broadcasters, Inc., licensee of Radio Station KYZX, to prepare the attached Technical Exhibit.

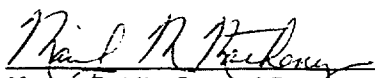
His qualifications are a matter of record before the Federal Communications Commission. He has been active in Broadcast Engineering since 1979.

The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

*This the 27th day of December, 1996.*

  
\_\_\_\_\_  
Jefferson G. Brock  
Affiant

*Sworn to and subscribed before me  
this the 27th day of December, 1996*

  
\_\_\_\_\_  
Notary Public, State of Georgia  
My Commission Expires: September 12, 1999

**Exhibit B**

# GRAHAM BROCK, INC.

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BROADCAST TECHNICAL CONSULTANTS

**TECHNICAL COMMENTS**  
**MM DOCKET # 97-35**  
**PUEBLO BROADCASTERS, INC.**  
**KYZX RADIO STATION**  
**PUEBLO, COLORADO**  
**March 1997**

**TECHNICAL EXHIBIT**

*Copyright 1997*

**TECHNICAL COMMENTS**  
**MM DOCKET # 97-35**  
**PUEBLO BROADCASTERS, INC.**  
**KYZX RADIO STATION**  
**PUEBLO, COLORADO**  
**March 1997**

**TECHNICAL STATEMENT**

1. This technical statement was prepared on behalf of Pueblo Broadcasters, Inc. ("PBI"), licensee of KYZX, Channel 283C2, Pueblo, Colorado. These comments are filed in response to a Commission Public Notice regarding consideration of a request of Calhan Radio Company ("CRC") to allot Channel 280A to Calhan, Colorado, MM Docket #97-35, DA #97-100.

**BACKGROUND**

2. PBI is also the Petitioner in MM Docket #96-232, which seeks to re-allot Channel 283C2 from Pueblo to Pueblo West, Colorado. During the comment period of this docket, PBI filed a counterproposal, seeking, among other things, the substitution of Channel 280C1 for Channel 283C2 at Pueblo and stating continued support for the change in community of license to Pueblo West. The remainder of the request in the counterproposal is incorporated herein by reference. The PBI counterproposal is mutually exclusive with the Channel 280A proposed allotment to Calhan. Therefore, PBI demonstrated the availability of an alternate Class A channel for Calhan which is compatible with the PBI counterproposal.<sup>1</sup>

3. CRC filed a reply to the PBI request suggesting the allotment of Channel 283C1 to Pueblo West at a different site than that proposed by PBI for the Channel 280C1 allotment. CRC

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1) In fact, the PBI alternative of Channel 284A is far less site restricted from Calhan than the Calhan Radio Company proposal. Channel 280A must be site restricted 12.4 kilometers from the community, while Channel 284A need only be restricted 3.0 kilometers from the community.

claims its proposed alternate channel at Pueblo West would not require the change of channels at Canon City, Colorado, as requested in the PBI counterproposal and would allow the allotment of Channel 280A at Calhan.

## **DISCUSSION**

4. The CRC proposal for Channel 283C1 at Pueblo West, Colorado, based on its proposed reference site, would allow a maximum Class C1 facility to provide a 1.0 mV/m coverage to 511,549 persons in 16,348.3 square kilometers. The PBI proposed allotment of Channel 280C1 at Pueblo West will deliver 1.0 mV/m service to 562,351 persons in 16,411.4 square kilometers.<sup>2</sup> The PBI request will provide service to 50,802 more persons than the CRC alternative.

5. The CRC proposal for Channel 280A at Calhan, Colorado, based on its proposed reference site, would allow a maximum Class A facility to provide a 1.0 mV/m coverage to 3,390 persons in 2,372.4 square kilometers. The PBI proposed allotment of Channel 284A at Calhan, at the less restrictive site, will deliver 1.0 mV/m service to 5,463 persons in 2,426.4 square kilometers.<sup>3</sup> The PBI request will provide an additional service to 2,073 more persons than the CRC original request at Calhan.

6. The CRC proposal for Pueblo West does not provide for the relocation of the KSTY facility in Canon City or the possible improvement of its facilities as outlined in the PBI request.

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2) All census data is 1990 U.S. Census information extracted from the PL 94-171 files.

3) All census data is 1990 U.S. Census information extracted from the PL 94-171 files.

Based on this information, the PBI proposal will provide superior population coverage in both Pueblo West and Calhan and will not preclude the allotment of a channel to Calhan, Colorado.

7. The foregoing technical statement was prepared on behalf of Pueblo Broadcasters, Inc., by Graham Brock, Inc., its Technical Consultants. All information contained herein is true and accurate to the best of our belief and knowledge.

**AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT**

*State of Georgia )*  
*St. Simons Island ) ss:*  
*County of Glynn )*

**JEFFERSON G. BROCK**, being duly sworn, deposes and says that he is an officer of Graham Brock, Inc. Graham Brock has been engaged by Pueblo Broadcasters, Inc., licensee of Radio Station KYZX, to prepare the attached Technical Exhibit.

His qualifications are a matter of record before the Federal Communications Commission. He has been active in Broadcast Engineering since 1979.

The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

*This the 14th day of March, 1997.*



\_\_\_\_\_  
**Jefferson G. Brock**  
*Affiant*

*Sworn to and subscribed before me*  
*this the 14th day of March, 1997*



\_\_\_\_\_  
*Notary Public, State of Georgia*  
*My Commission Expires: September 12, 1999*

# CERTIFICATE OF SERVICE

The undersigned, an employee of Haley Bader & Potts P.L.C., hereby certifies that the foregoing document was mailed this date by First Class U.S. Mail, postage prepaid, or was hand-delivered\*, to the following:

Henry E. Crawford, Esq.  
Law Offices of Henry E. Crawford  
1150 Connecticut Avenue, N.W.  
Suite 900  
Washington, DC 20036

Counsel for Calhan Radio Company

Nancy E. Davis

March 17, 1997